

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 1

September 26, 2013

Ms. Sarah Juris
Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Committee ID: C00521013

RE: Amended October Quarterly Report (07/01/2012-09/30/2012), Received by the FEC 10/24/2012

Dear Ms. Juris,

I am writing as counsel to Florida Freedom PAC (FFP) in response to the Commission's request for additional information related to items disclosed on the committee's Amended October Quarterly Report which the FEC received on 10/24/2012.

The Commission has asked about an increase in disbursements ""in certain categories"" of disbursements. The committee's original report disclosed two independent expenditures to The Pivot Group totaling \$9620. However, it was later discovered that the actual amount totaled \$31,264, therefore, the committee filed an amended 48-hour report along with an amended October Quarterly report to disclose the corrected total.

Further, the Commission is inquiring about an increase in disbursements on the committee's Amended July Quarterly Report received by the FEC 10/11/2012. Please note the committee's response to a prior request for additional information which addresses this exact same question. This response was filed on 02/14/2013, and explains that ... ""the increase in disbursements stems from using the incorrect data from the committee's accounting software to compile the July Report. After an internal review of the committee's second quarter activity, the committee determined that the original July Quarterly Report contained transactions that were disclosed as actual disbursements when they should have been reported as memo items. Subsequently, when the amended report was filed, an adjustment to the debt schedule was required because of the addition of these memo-entried disbursements.""

The committee would also like to note for the record that requesting information about two separate reports in the same letter (with a misleading caption that fails to mention the second report questioned) is an unorthodox approach by the Commission.

If you have any further questions regarding this matter, please feel free to contact me at 202-328-3500.

Very truly yours,
John Pomeranz
Counsel to Florida Freedom PAC

cc: Gihan Perera, Treasurer, Florida Freedom PAC
